



Your business
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 16, 2015

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2015 ETC Annual Report of Consolidated Telecom
Study Area Code 381607**

Dear Ms. Dortch:

On behalf of Consolidated Telecom (“Consolidated”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ Consolidated seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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June 16, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2015 ETC Annual Report of Consolidated Telecom
Study Area Code 381607
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Consolidated Telecom (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).³
2. Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan (“Five-Year Plan”) which is contained in the attachment to the 2014 Report.⁴
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

 FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	381607
<015>	Study Area Name	CONSOLIDATED TELCOM
<020>	Program Year	2016
<030>	Contact Name: Person USAC should contact with questions about this data	Ken Weisenberger
<035>	Contact Telephone Number: Number of the person identified in data line <030>	7014837376 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	ken@consolidatedtelcom.com

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
(check box when complete)			
<100>	Service Quality Improvement Reporting (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200>	Outage Reporting (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300>	Unfulfilled Service Requests (voice) 2 381607nd310.pdf	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310>	Detail on Attempts (voice) (attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband) 6 381607nd330.pdf	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330>	Detail on Attempts (broadband) (attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile 0.0		
<430>	Number of Complaints per 1,000 customers (broadband)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440>	Fixed 0.0		
<450>	Mobile 0.0		
<500>	Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	381607nd510.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	381607nd610.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710>	Company Price Offerings (broadband) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800>	Operating Companies and Affiliates (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000>	Voice Services Rate Comparability Certification Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010>	 (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<1100>	Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers (complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

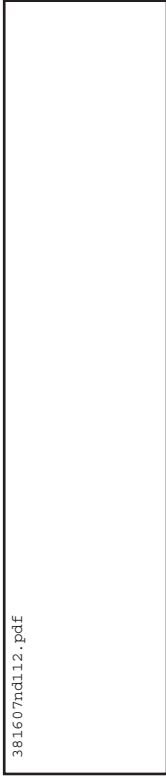
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(100) Service Quality Improvement Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	381607
<015>	Study Area Name	CONSOLIDATED TELCOM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ken Weisenberger
<035>	Contact Telephone Number - Number of person identified in data line <030>	7014837376 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ken@consolidatedtelcom.com
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<div> <input type="radio"/> (yes / no) </div> <div> <input type="radio"/> (yes / no) </div>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	381607
<015>	Study Area Name	CONSOLIDATED TELCOM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ken Weisenberger
<035>	Contact Telephone Number - Number of person identified in data line <030>	7014837376 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ken@consolidatedtelcom.com

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

ken@consolidatedtel.com.com

See attached worksheet

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	381607
<015>	Study Area Name	CONSOLIDATED TELCOM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ken Weisenberger
<035>	Contact Telephone Number - Number of person identified in data line <030>	7014837376 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ken@consolidatedtelcom.com

<910>	Tribal Land(s) on which ETC Serves	Three Affiliated Tribes
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<920>	Tribal Government Engagement Obligation	381607nd920.pdf	Name of Attached Document
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If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

(1100) No Terrestrial Backhaul Reporting		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	381607
<015>	Study Area Name	CONSOLIDATED TELCOM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ken Weisenberger
<035>	Contact Telephone Number - Number of person identified in data line <030>	7014837376 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ken@consolidatedtelcom.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers		FCC Form 481
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Collection Form		July 2013

<010>	Study Area Code	381607
<015>	Study Area Name	CONSOLIDATED TELCOM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ken Weisenberger
<035>	Contact Telephone Number - Number of person identified in data line <030>	7014837376 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ken@consolidatedtelcom.com

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	<div></div>	Name of Attached Document
<1220>	Link to Public Website		
		HTTP	http://www.ctctel.com/telephone_lifeline.asp

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2000) Price Cap Carrier Additional Documentation		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>		July 2013

<010>	Study Area Code	3816U7
<015>	Study Area Name	CONSOLIDATED TELCOM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ken Weisenberger
<035>	Contact Telephone Number - Number of person identified in data line <030>	7014837376 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ken@consolidatedtelcom.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)i}
- <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}
- <2011b> Attachment {47 CFR § 54.313(b)(1)ii}

Name of Attached Document(s) Listing Required Information	

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
- <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
- <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
- <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

Certification Support Used to Build Broadband

--

Connect America Phase II Reporting {47 CFR § 54.313(e)}

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification

Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

--

<2021> Interim Progress Community Anchor Institutions

--

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation	
Data Collection Form	
FCC Form 481	
OMB Control No. 3060-0986/OMB Control No. 3060-0819	
July 2013	

<010>	Study Area Code	381607
<015>	Study Area Name	CONSOLIDATED TELCOM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ken Weisenberger
<035>	Contact Telephone Number - Number of person identified in data line <030>	7014837376 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ken@consolidatedtel.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(ii))	<div>381607nd3010.pdf</div> <div>Name of Attached Document Listing Required Information</div>
(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<div></div>
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))	<div></div>
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<div><input checked="" type="radio"/> (Yes/No)</div>
(3014)	If yes, does your company file the RUS annual report	<div><input checked="" type="radio"/> (Yes/No)</div>
Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<div><input checked="" type="checkbox"/></div>
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div><input checked="" type="checkbox"/></div>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	<div>381607nd3017.pdf</div> <div>Name of Attached Document Listing Required Information</div>
(3018)	If the response is no on line 3014, Is your company audited?	<div><input type="radio"/> (Yes/No)</div>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<div><input type="checkbox"/></div> <div><input type="checkbox"/></div>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div><input type="checkbox"/></div>
(3021)	Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:	<div><input type="checkbox"/></div>
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<div><input type="checkbox"/></div>
(3023)	Underlying information subjected to a review by an independent certified public accountant	<div><input type="checkbox"/></div>
(3024)	Underlying information subjected to an officer certification.	<div><input type="checkbox"/></div>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div><input type="checkbox"/></div>
(3026)	Attach the worksheet listing required information	<div></div> <div>Name of Attached Document Listing Required Information</div>

<010>	Study Area Code	381607
<015>	Study Area Name	CONSOLIDATED TELCOM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ken Weisenberger
<035>	Contact Telephone Number - Number of person identified in data line <030>	7014837376 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ken@consolidatedtelcom.com

Financial Data Summary

- (3027) Revenue
- (3028) Operating Expenses
- (3029) Net Income
- (3030) Telephone Plant In Service(TPIS)
- (3031) Total Assets
- (3032) Total Debt
- (3033) Total Equity
- (3034) Dividends

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	381607
<015>	Study Area Name	CONSOLIDATED TELCOM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ken Weisenberger
<035>	Contact Telephone Number - Number of person identified in data line <030>	7014837376 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ken@consolidatedtelcom.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	381607
<015> Study Area Name	CONSOLIDATED TELCOM
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Ken Weisenberger
<035> Contact Telephone Number - Number of person identified in data line <030>	7014837376 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	ken@consolidatedtelcom.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>John Staurulakis, Inc</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	John Staurulakis, Inc
Name of Reporting Carrier:	CONSOLIDATED TELCOM
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/15/2015
Printed name of Authorized Officer:	Ken Weisenberger
Title or position of Authorized Officer:	CFO
Telephone number of Authorized Officer:	7014834000 ext.
Study Area Code of Reporting Carrier:	381607 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	CONSOLIDATED TELCOM
Name of Authorized Agent or Employee of Agent:	JSI
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/15/2015
Printed name of Authorized Agent or Employee of Agent:	Cassandra Heyne
Title or position of Authorized Agent or Employee of Agent:	Consultant
Telephone number of Authorized Agent or Employee of Agent:	3014597590 ext.
Study Area Code of Reporting Carrier:	381607 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and
Progress Report**

ATTACHMENT REDACTED IN ENTIRETY

REF	CUSTOMER NAME	DESCRIPTION OF SERVICE REQUESTED	SERVICE REQUESTED (✓ ALL APPLICABLE TO UNFULFILLED REQUEST)		BROADBAND	DESCRIBE HOW CARRIER ATTEMPTED TO PROVIDE SERVICE
			BROADBAND	VOICE	SPEED REQUESTED	
1	Customer 1	fiber	x	x		customer didn't sign easements soon enough and couldn't agree on the route
2	Customer 2	fiber	x	x		requested too late in year for construction to happen
3	Customer 3	fiber	x			requested too late in year for construction to happen
4	Customer 4	fiber	x			requested too late in year for construction to happen
5	Customer 5	fiber	x			requested too late in year for construction to happen
6	Customer 6	fiber	x			requested too late in year for construction to happen

Consolidated Telcom’s Demonstration of Compliance with Applicable Service Quality Standards and Consumer Protection Rules:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Consolidated Telcom (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under federal law and, to a limited extent under North Dakota state law as a telecommunications carrier subject to North Dakota Public Service Commission regulation. These obligations include, but are not limited to, the following: (1) adherence to state requirements that the Company complies with consumer protection and service quality standards pursuant to North Dakota Administrative Code Article 69, including customer requests for lowest price service

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

alternatives (69-09-05-01), discontinuance of telecommunications services (69-09-05-02), deposits and guarantees (69-09-05-03); (2) truth-in-billing requirements, and (3) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

Consolidated Telcom's Demonstration of Ability to Function in Emergency Situations

Consolidated Telecom hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2)¹ and North Dakota Administrative Code 69-09-05-12. The Company's voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company's central office can maintain 8 hours, plus or minus 15 percent, of battery reserve rated for peak traffic load requirements, and a permanent auxiliary power unit is installed. The Company has battery backup at all office locations and in its electronic equipment sites capable of running for a minimum of 8 hours, plus or minus 15 percent. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

locations. They will continue to run as long as the Company has access to fuel. The Company tests the batteries at least once per year.

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	381607
<015>	Study Area Name	CONSOLIDATED TELCOM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ken Weisenberger
<035>	Contact Telephone Number - Number of person identified in data line <030>	7014837376 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ken@consolidatedtelcom.com

1/1/2015

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
ND	(275) N Scranton		FR	21.0	0.0	0.0	2.3	23.3
ND	(278) S Scranton		FR	21.0	0.0	0.0	2.3	23.3
ND	(279) Rhame		FR	21.0	0.0	0.0	1.8	22.8
ND	(523) Bowman		FR	21.0	0.0	0.0	1.23	22.23
ND	(548) Dunn Center		FR	21.0	0.0	0.0	2.5	23.5
ND	(563) Regent		FR	21.0	0.0	0.0	2.3	23.3
ND	(564) S Hettinger		FR	21.0	0.0	0.0	0.41	21.41
ND	(567/637) Hettinger		FR	21.0	0.0	0.0	0.41	21.41
ND	(573) Manning		FR	21.0	0.0	0.0	7.0	28.0
ND	(574) N Ladd		FR	21.0	0.0	0.0	3.9	24.9
ND	(576) S Ladd		FR	21.0	0.0	0.0	3.9	24.9
ND	(579) New England		FR	21.0	0.0	0.0	3.51	24.51
ND	(677) South Heart		FR	21.0	0.0	0.0	4.6	25.6
ND	(764) Killdeer		FR	21.0	0.0	0.0	4.72	25.72
ND	(824) Mott		FR	21.0	0.0	0.0	0.41	21.41
ND	(846) Dodge		FR	21.0	0.0	0.0	1.2	22.2
ND	(853) Reeder		FR	21.0	0.0	0.0	2.5	23.5
ND	(855) S Reeder		FR	21.0	0.0	0.0	2.5	23.5
ND	(863) Grassy Butte		FR	21.0	0.0	0.0	2.9	23.9
ND	(879) Amidon		FR	21.0	0.0	0.0	3.4	24.4
ND	(938) Halliday		FR	21.0	0.0	0.0	0.9	21.9

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	381607
<015>	Study Area Name	CONSOLIDATED TELCOM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ken Weisenberger
<035>	Contact Telephone Number - Number of person identified in data line <030>	7014837376 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ken@consolidatedtelcom.com

1/1/2015	
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	Residential Local Service Charge Effective Date
<701>	Single State-wide Residential Local Service Charge
<702>	

<703>

[illegible]

(710) Broadband Price Offerings
Data Collection Form
FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	381607
<015>	Study Area Name	CONSOLIDATED TELCOM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ken Weisenberger
<035>	Contact Telephone Number - Number of person identified in data line <030>	7014837376 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ken@consolidatedtelcom.com

[illegible]

(800) Operating Companies
Data Collection Form

<010>	Study Area Code	381607
<015>	Study Area Name	CONSOLIDATED TELCOM
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ken Weisenberger
<035>	Contact Telephone Number - Number of person identified in data line <030>	7014837376 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ken@consolidatedtelcom.com
<810>	Reporting Carrier	Consolidated Telcom
<811>	Holding Company	Consolidated Enterprises, Inc.
<812>	Operating Company	Consolidated Telcom

[illegible]

REDACTED FOR PUBLIC INSPECTION
ETC Annual Reporting Requirements 47 CFR §54.313(a)(9) – ETCs Serving Tribal Lands

Section 1: Certification of Officer

Section 54.313(a)(9) of the rules of the Federal Communications Commission (“FCC”) requires Consolidated Telcom (“The Company”), SAC 381607, to provide documents and information regarding discussions that The Company had with Tribal governments located within The Company’s service area. The Company certifies that it followed the guidance outlined in the FCC’s July 19, 2012 Public Notice¹ wherein the FCC issued guidance on the Tribal government engagement obligation provisions of the Connect America Fund.

I, Bryan W. Personne, am an officer of Consolidated Telcom and hereby certify that The Company is in compliance with the FCC’s Tribal engagement requirements, and the statements made in this report are accurate:

Name of Officer (Print):	<u>Bryan W. Personne</u>
Title:	<u>Chief Operating Officer</u>
Signature:	<u></u>
Date:	<u></u>

¹ See Office of Native Affairs and Policy, Wireless Telecommunications Bureau, and Wireline Competition Bureau Issue Further Guidance on Tribal Government Engagement Obligation Provisions of the Connect America Fund, Public Notice, DA 12-1165, WC Docket Nos. 10-90 et al. (July 19, 2012) (“*Further Guidance*”)

REDACTED FOR PUBLIC INSPECTION
ETC Annual Reporting Requirements 47 CFR §54.313(a)(9) – ETCs Serving Tribal Lands

Section 2: Company and Tribal Information

The Company is a state-designated ETC serving Tribally-owned lands in North Dakota. The Tribally-owned lands are in Twin Buttes, North Dakota, and belong to the Three Affiliated Tribes. The Company serves approximately 83 square miles of Tribal land and this area has approximately 85 residences and 18 businesses. Population is estimated at less than 250 for the Tribal lands served by The Company.

As of December 31, 2014, the Company provides voice telephone service to 54% of the residences and 67% of the businesses in this Tribally-owned area. The Company provides broadband service to 68% of the residences and 67% of the businesses in this Tribally-owned area. Marketing efforts appear to have been effective in 2014 in that broadband subscriber numbers grew from 54% residential and 56% businesses in 2013. The Company completed construction in 2012 to 100% of the residences and businesses in the tribal lands with FTTH. Cut-over to the new FTTH facilities began in April 2013 and was 100% complete by April 30, 2014. The Company now provides video services to 12% of the residences and 6% of the businesses. Video services were not available from the Company in this Tribally-owned area prior to the FTTH conversion so this is all new customer growth.

The Company initiated the engagement process outlined in the *Further Guidance* in 2012. The Company first contacted Tribal leaders in October 2012 by letter about the Tribal engagement process. The following employee(s) participated in the Tribal engagement:

Name:	<u>Bryan W. Personne</u>	<u></u>
Title:	<u>Chief Operating Officer</u>	<u></u>

The Company successfully contacted the following individual/s:

Name:	<u>Melissa Star</u>
Title:	<u>Executive Assistant to the Tribal Chairman and Regional Councilman</u>
Tribal Affiliation:	<u>Three Affiliated Tribes</u>
Address:	<u>704C 79E. Ave. NW</u>
	<u>Twin Buttes, ND 58636</u>
Email Address:	<u>Unknown</u>
Telephone Number:	<u>701-938-4403</u>

ETC Annual Reporting Requirements 47 CFR §54.313(a)(9) – ETCs Serving Tribal Lands**Section 3: 54.313(a)(9)(i) A Needs Assessment and Deployment Planning**

Describe in detail how your company engaged with Tribal leaders in 2014 on issues related to the Tribe's communications needs, goals, priorities, anchor institutions, and community; and how your company has communicated its deployment priorities and processes, services that can be provided, timelines for the provision of service, and any potential opportunities for partnering with Tribal governments.

In October 2012 the Company sent a letter to Tribal authorities for our service area regarding the engagement process. On December 12, 2012, the Company had a conference call with Melissa Star, Executive Assistant to the Tribal Chairman and Regional Councilman. She represented that she was the contact for this type of issue for the area we serve and that she would relay all the information discussed at the next district meeting. We discussed the status of the FTTH overbuild of the Tribal lands served. All mainline and drops were complete as of the date of the conference, with cutover to new facilities to begin in early 2013 after testing of the new facilities was completed. Explanation of new services that would be available, in addition to Telephone service, on the FTTH facilities: Broadband and Video. No known issues with service then or current marketing techniques used were identified. Future contact with the Tribal representative to occur once FTTH cut over began if there were issues marketing new services available. Company provided Ms. Star direct contact information for Bryan W. Personne, Chief Operating Officer of Consolidated Telcom, should any issues arise. Ms. Star indicated there was no need to contact anyone else in the Tribal government regarding the engagement process as she was the responsible party for our service area and would relay the information to other Tribal leaders. The bulk of 2013 was spent converting Tribal customers to the new FTTH facilities. This process was facilitated by direct mail pieces to all customers, followed by telephone calls to each location, and if there was still no response then our local service technician physically visited each location to contact the owner for the FTTH conversion. In December 2013 our local service technician made contact with the Tribal Business Office several times a week for the entire month attempting to locate owners for the last locations that had not responded to mailings and phone calls to complete the FTTH conversion. In 2014 we again did direct mail pieces to all tribal residents in April and again in December. The local service technician also utilized door hanger pieces for unresponsive residents. We also attempted to purchase airtime on the tribal radio station in April 2014 and again in May 2014 for promoting the availability of services.

Section 4: 54.313(a)(9)(ii) Feasibility and Sustainability Planning

Describe how your company engaged with Tribal leaders in 2014 regarding network feasibility and sustainability challenges (like terrain, remoteness, and poverty) and opportunities.

No known feasibility and sustainability challenges were identified in 2014. The Company believes the only feasibility and sustainability challenges faced are related to the uncertainty surrounding USF and Intercarrier Compensation.

ETC Annual Reporting Requirements 47 CFR §54.313(a)(9) – ETCs Serving Tribal Lands

Section 5: 54.313(a)(9)(iii) Marketing Services in a Culturally Sensitive Manner

Describe how your company engaged with Tribal leaders in 2014 on cultural factors to consider when marketing and deploying communications on Tribal lands, to ensure that the services are marketed in a manner that will relate directly to the community, resonate with consumers, and stimulate increased adoption of services on Tribal lands.

No known problems with current marketing techniques were identified in the 2014. In 2014 we did 2 additional direct mail pieces and the local service technician used door hanger pieces for non-responsive residents. We also attempted to purchase airtime on the tribal radio station in April 2014 and again in May 2014 for promoting the availability of services. The Company will continue to market the availability of new services and will consult Tribal representatives to explore additional marketing concepts as needed.

Section 6: 54.313(a)(9)(iv) Rights of Way Processes, Land Use Permitting, Facilities Siting, Environmental and Cultural Preservation Review Processes

Describe how your company engaged with Tribal leaders in 2014 about compliance with rights of way, land use permitting, facilities siting, and environmental and cultural preservation on Tribal lands. Communications providers should obtain a comprehensive list of all processes required to provide service on Tribal lands, and should provide documentation of compliance with these processes.

There were no land use issues in 2014 as all FTTH construction had been completed in 2012. The Company uses professional engineering services to ensure that design and work on Tribal lands is done in accordance with Tribal land use procedures and requirements.

Section 7: 54.313(a)(9)(v) Compliance with Tribal Business Licensing Requirements

Describe how your company engaged with Tribal leaders in 2014 about compliance with business licensing on Tribal lands. Tribal business and licensing requirements include business practice licenses that Tribal and non-Tribal business entities, whether located on or off Tribal lands, must obtain upon application to the relevant Tribal government office or division to conduct any business or trade, or deliver any goods or services to the Tribes, Tribal members, or Tribal lands. These include certificates of public convenience and necessity, Tribal business licenses, and other related forms of Tribal government. Include all supporting documentation.

There were no business licensing issues in 2014 as all FTTH construction had been completed in 2012. The Company uses professional engineering services to ensure that design and work on Tribal lands is done in accordance with Tribal licensing procedures and requirements.

Section 8: Contact Summary

Please list all contact the Company had with the Tribal government below.

ETC Annual Reporting Requirements 47 CFR §54.313(a)(9) – ETCs Serving Tribal Lands

Date	Contact Type (In-person, phone, email, etc.)	Employee Contact	Tribal Contact	Successful Attempt? (Yes/No)
Jan-April 2014	Telephone and or in person	Local Service Technician	Tribal Business Office	Contacted as needed attempting to locate owners or residents for locations still needing to be converted to FTTH facilities
April 2014	Phone call, Email and Mail	Marketing Manager	Clarence Sun with Tribal Radio Station - KMHA	No response back from radio station
May 2014	Mailed 2 radio spots on dvd	Marketing Manager	Clarence Sun with Tribal Radio Station – KMHA	No response back from radio station
September 2014	Email	Marketing Manager	L. Archambault with Tribal Radio Station – KMHA	No response back from radio station

Consolidated Telcom (SAC 381607)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Consolidated Telcom hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly Began Providing Service

[illegible]

1 The FCC has defined community anchor institutions in Section 54.5 of its Rules as “schools, libraries, health care providers, community colleges, other institutions of higher education, and other community support organizations and entities.”

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY